

**VERMONT PUBLIC POWER
SUPPLY AUTHORITY**

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2010 FEB 24 AM 9:35

February 22, 2010

Susan M. Hudson, Clerk
Vermont Public Service Board
112 State Street, Drawer 20
Montpelier, VT 05620-2701

re: docket 7466

Investigation Petition Filed by Vermont Department of
Public Service re: Energy Efficiency Utility Structure – Phase 2

Dear Mrs. Hudson:

Enclosed please find comments of the Group of Municipal Electric Utilities on the Hearing Officer's Proposal for Decision in this matter.

Thank you for your consideration.

Very truly yours,


David John Mullett

cc: service list

STATE OF VERMONT
PUBLIC SERVICE BOARD

VERMONT PUBLIC
SERVICE BOARD
2010 FEB 24 AM 9:35

Docket No. 7466

Investigation into Petition Filed by Vermont)
Department of Public Service re: Energy)
Efficiency Utility Structure ---Phase 2)

**COMMENTS OF THE GROUP OF MUNICIPAL ELECTRIC UTILITIES ON
HEARING OFFICER'S PROPOSAL FOR DECISION**

The Group of Municipal Electric Utilities (GMEU)* offers the following comments on the Hearing Officer's Proposal for Decision ("PFD") sent under cover letter of February 17, 2010.


1. *Notification of OPA.* The Proposal for Decision calls for notification of the OPA in electric bills, if the utility "billing systems can accommodate such notice." PFD at 2. As the Board is aware from prior dockets, many if not all of the GMEU systems have billing systems under which the placing of such notice would be difficult. Rather than forego such notice completely, GMEU would suggest that notice be posted in each of the GMEU member offices, as well as on the Vermont Public Power Supply Authority web site.

2. *Timing of OPA notice.* It is the GMEU's understanding that the April notification discussed above may be difficult given the lead time necessary for those utilities that can include the contemplated notice within their bills. GMEU would support an extension of the deadlines set forth at pages 3 and 4 of the PFD to the extent necessary to accommodate these concerns while still ensuring that this docket moves aggressively toward conclusion.

3. *General evaluation criteria.* GMEU accepts the general criteria for the OPA as set forth in the PFD. These criteria are narrow enough to provide reasonable focus to the analysis, and broad enough to ensure that reasonable issues and concerns can be addressed within the general framework of the criteria.

Dated this 22nd day of February, 2010.

Group of Municipal Electric Utilities

By: 
David John Mullett, General Counsel
Vermont Public Power Supply Authority
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* Barton Village, Inc. Electric Department, Village of Enosburg Falls Water & Light Department, Town of Hardwick Electric Department, Village of Hyde Park, Inc. Electric Department, Village of Jacksonville Electric Company, Village of Johnson, Inc. Water & Light Department, Village of Ludlow Electric Light Department, Village of Lyndonville Electric Department, Village of Morrisville Water & Light Department; Northfield Electric Department, Village of Orleans, Inc. Electric Department, Town of Readsboro Electric Light Department, Swanton Village, Inc. Electric Department